

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 05-388
)	Judge Bloch
RICHARD REICHERT)	
)	

GOVERNMENT'S POSITION WITH RESPECT TO SENTENCING FACTORS

AND NOW, comes the United States of America by its attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Tina O. Miller, Assistant United States Attorney for said district, and submits the following position with respect to sentencing factors:

1. The government has no objections, additions or modifications to the Presentence Report.

2. Pursuant to the plea agreement, the government moves, pursuant to Section 3E1.1 of the Sentencing Guidelines, the court to reduce the offense level by three levels for acceptance of responsibility, on the grounds that the offense level prior to application of Section 3E1.1 is 16 or greater, and Defendant timely notified authorities of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the court to allocate its resources efficiently.

Respectfully submitted,

MARY BETH BUCHANAN
United States Attorney

/s/ Tina O. Miller

TINA O. MILLER
Assistant U.S. Attorney
PA ID No. 71101